

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S4-4:15CR 404 HEA
)	
OSCAR DILLON, III,)	
MICHAEL GRADY,)	
)	
Defendants.)	

**GOVERNMENT’S MOTION TO CONTINUE HEARING ON THE MOTION TO
DISMISS THE INDICTMENT**

Comes now the United States of America by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri and Tom Rea and Michael A. Reilly, Assistant United States Attorneys for the Eastern District of Missouri, and for its motion to continue hearing, states as follows:

1. On January 15, 2018, Defendant Dillon filed his Motion to Continue (Doc. # 1497), seeking to continue to the hearing on the Motion to Dismiss to February 13, 2018. The Court granted Defendant Dillon’s unopposed Motion to continue the hearing to February 13, 2018.

2. On February 8, 2018, undersigned counsel was diagnosed with the flu at the Employee Health Unit. I believe that in my current condition that my continued presence in the United States Attorney’s Office and the courthouse jeopardizes USAO staff, witnesses, and courthouse staff.

3. The United States proposes that the matter be continued for approximately two weeks, subject to opposing counsel’s complex schedules.

4. The United States also proposes that evidentiary inspections of sensitive material previously scheduled for next Monday and/or Tuesday remain on track and that counsel inspect sensitive witness material and/or voluminous documents seized from the Congress residence. Due to the nature of the materials, the United States has requested that the materials be inspected in the U.S. Attorney's Office in St. Louis. Counsel for Defendant Grady began her inspection of the materials this week, and has requested to inspect additional materials, some of which the United States will produce, and some of which the United States requests be inspected in the United States Attorney's Office.

5. Undersigned counsel is unavailable from March 10-14, 2018.

WHEREFORE, for the reasons stated herein, the Government requests that the previously scheduled evidentiary inspections remain set for next week, but that the evidentiary hearing be continued for a brief period, subject to opposing counsel's schedules.

Respectfully Submitted,

JEFFREY B. JENSEN
United States Attorney

s/ Michael A. Reilly
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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2018, the foregoing was filed electronically and under seal with the Clerk of the Court; Counsel for Defendant will be served via email.

s/ Michael A. Reilly

MICHAEL A. REILLY, #43908MO

Assistant United States Attorney